

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF OKLAHOMA**

(1) OMID AHMADI,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 22-CV-529-CVE-JFJ
)	
(1) CITY OF TULSA;)	
(2) TULSA MUNICIPAL JAIL;)	
)	
Defendants.)	

NOTICE OF REMOVAL

Defendant, City of Tulsa, ("City") hereby notifies the Court and all parties as follows:

1. The City and are defendants in a civil action entitled *Omid Ahmadi v. City of Tulsa, Tulsa Municipal Jail*, Case Number CJ-2022-01662 filed on June 1, 2022 in the District Court of Tulsa County, State of Oklahoma, (hereinafter "State Court Action").
2. Defendant City was served with the Summons and Petition on November 21, 2022.
3. Defendant makes a written demand for jury trial at this time and will make such a demand in its Answer.
4. In his Petition, Plaintiff Omid Ahmadi alleges, pursuant to 42 U.S.C. § 1983, that the City of Tulsa violated his Fourth and Fourteenth Amendment constitutional rights by failing to provide adequate medical and mental health services, failing to provide him with safe surroundings, and physical abuse.
5. Plaintiff claims he suffered actual physical damages and seeks pecuniary and non-economic damages. Plaintiff states he is seeking damages in excess of \$75,000.

6. Federal subject matter jurisdiction in this action exists by reason of the federal question described above pursuant to 28 U.S.C. §1331.

7. This Court has supplemental jurisdiction over Plaintiff's state law claims because those claims are so related to the federal claims in this actions that they form part of the same case or controversy pursuant to 28 U.S.C. §1367

8. The removal of this action is authorized by 28 U.S.C.A. § 1441(a), which allows the removal of any civil action brought in a state court of which the District Courts of the United States have original jurisdiction.

9. Copies of the state court docket sheet as well as copies of all process, pleadings, and orders filed in the State Court case and subsequently served upon Defendant are attached as Exhibit A.

10. Only the City has been properly served at this time, therefore, all properly served defendants consent to and join in this Notice of Removal.

Respectfully Submitted,

CITY OF TULSA,
a municipal corporation

JACK C. BLAIR,
City Attorney

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CERTIFICATE OF SERVICE

I, Hayes T. Martin, certify that on the 7th day of December, 2022 a true and correct copy of the above and foregoing document was sent via U.S. mail to the following recipient:

D. Mitchell Garrett
David C. Bean
GARRETT LAW
320 S. Boston Ave., Ste. 825
Tulsa, OK 74103
(918) 221-6190

/s/Hayes T. Martin
HAYES T. MARTIN